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Counsel for Defendant Meta Platforms, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, *et al.*,
Individual and Representative Plaintiffs,
v.
META PLATFORMS, INC., a Delaware
corporation,
Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF PHILLIP E. MORTON IN
SUPPORT OF META'S ADMINISTRATIVE
MOTION REQUESTING LEAVE FOR
REBUTTAL EXPERT REPORT AND
DEPOSITIONS**

1 I, Phillip E. Morton, hereby declare:

2 1. I am a partner at the law firm of Cooley LLP, counsel of record for defendant Meta
3 Platforms, Inc. (“Meta”) in the above-captioned case. I have personal knowledge of the facts
4 recited in this declaration and, if called as a witness, could and would testify competently to them.

5 2. I make this declaration in support of Meta’s Administrative Motion Requesting
6 Leave for Rebuttal Expert Report and Depositions.

7 3. On March 20, 2025, counsel for Meta (Phillip Morton and Angela Dunning) met
8 and conferred via video conference with counsel for Plaintiffs (including Maxwell Pritt, Josh
9 Stein and Margaux Poueymirou) regarding the relief requested in the Motion. A stipulation could
10 not be obtained because Plaintiffs opposed the requested relief, including the proposed
11 declaration and rebuttal report.

12 I declare under penalty of perjury under the laws of the United States of America that the
13 foregoing is true and correct.

14 Executed in Washington, District of Columbia on this 21th day of March 2025.

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16 /s/ Phillip E. Morton
17 Phillip E. Morton
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